

Hearing Date: February 16, 2011 at 10:00 a.m.

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Creditors of Lehman Brothers Holdings Inc., et al.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	X	

**JOINDER OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO  
LCPI'S OBJECTION TO FIDELITY NATIONAL TITLE INSURANCE  
COMPANY'S MOTION TO COMPEL COMPLIANCE WITH  
REQUIREMENTS OF TITLE INSURANCE POLICIES INSURING DEEDS  
OF TRUST HELD BY THE BANKRUPTCY ESTATE OF DEBTOR  
LEHMAN COMMERCIAL PAPER INC. PURSUANT TO  
SECTIONS 105, 362, 365 AND 1107 OF THE BANKRUPTCY CODE**

The Official Committee of Unsecured Creditors (the "Committee") of  
Lehman Brothers Holdings Inc. ("LBHI") and its affiliated chapter 11 debtors and  
debtors in possession (collectively, the "Debtors") hereby joins (the "Joinder") in  
Lehman Commercial Paper, Inc.'s ("LCPI") objection, filed on February 9, 2011 (the  
"Objection") [Docket No. 14398], to the motion (the "Motion") [Docket No. 11513] of  
the Fidelity National title Insurance Company ("Fidelity")<sup>1</sup> to compel compliance with

<sup>1</sup> Capitalized terms not otherwise defined or noted herein shall have the meanings ascribed to them  
in the Objection.

the requirements with the Policies insuring deeds of trust held by LCPI's estates, and in support thereof, respectfully states as follows:

**JOINDER**

1. The Committee joins in the Debtors' opposition to the relief sought in the Motion for each of the reasons set forth in the Objection, including, without limitation on the grounds that: (i) by all accounts LCPI has cooperated with Fidelity in producing documentation related to the Projects as required in the Policies; and (ii) LCPI has assured its continued cooperation with respect to the Policies and Fidelity's related requests.

WHEREFORE, the Committee respectfully requests that the Court (i) deny the Motion; (ii) grant the relief requested in the Objection; and (iii) grant the Committee such other relief as is just.

Dated: New York, New York  
February 14, 2011

**MILBANK, TWEED, HADLEY & M<sup>c</sup>CLOY LLP**

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